

**DOCKETED**

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<b>Document Title:</b>	Steve Uhler Comments - OIR-2021-01 PSDP will be made redundant by LMS, MIDAS, RIN, and SRT
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*Comment Received From: Steve Uhler  
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**OIR-2021-01 PSDP will be made redundant by LMS, MIDAS, RIN, and SRT**

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The dynamic nature of load management using the Commission's Market Informed Demand Automation Server (MIDAS) and the ability to provide more current greenhouse gas (GHG) information to the end user through the Statewide Rate Tool (SRT) will make the proposed Pre-Rulemaking Amendments to the Power Source Disclosure Program redundant.

A offer or a tariff does not have to be pursuant to LMS, any offer or tariff could be provided with GHG monthly, making PSDP redundant.

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*Additional submitted attachment is included below.*

OIR-2021-01 PSDP will be made redundant by LMS, MIDAS, RIN, and SRT

The dynamic nature of load management using the Commission's Market Informed Demand Automation Server (MIDAS) and the ability to provide more current greenhouse gas (GHG) information to the end user through the Statewide Rate Tool (SRT) will make the proposed Pre-Rulemaking Amendments to the Power Source Disclosure Program redundant.

"Electricity portfolio" means the electricity products that a retail supplier offers to sell to consumers in California under terms and conditions specific to an offer or to a tariff.

A offer or a tariff pursuant to Load Management Standards (LMS) 20 CCR section 1623 and 1623.1, with rates contained in MIDAS using Rate Identification Numbers (RIN) and managed by the SRT, would not benefit from the current Pre-Rulemaking Amendments to the Power Source Disclosure Program.

See attached prototype file of a proposed SRT, that could be provided monthly as timely as monthly billing for electric service.

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